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UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON JOEL CRESPIN,

Defendant.

MOTION TO REOPEN DETENTION
HEARING

Case No. 1:21-cr-00024-JNP-DBP

The defendant, Ramon Joel Crespin, moves to reopen detention proceedings based on new information unknown to him or the Court at the time of the original hearing that has a material bearing on whether he is likely to flee or pose a danger to the community pending trial. *See* 18 U.S.C. § 3142(f). He bases his motion on the following grounds:

1. On March 17, 2021, the grand jury returned an indictment charging Mr. Crespin with possession of methamphetamine with intent to distribute. ECF No. 1.
2. Mr. Crespin made an initial appearance March 31, 2021. He didn't resist

the government's motion for detention and the Court ordered him detained pending trial. ECF Nos. 12, 15.¹

3. Mr. Crespin has a significant substance abuse history and much of his criminal history involves drug possession or distribution. He's received only minimal drug treatment in Utah State Prison and through Adult Probation and Parole.

4. Mr. Crespin, on his own initiative, applied for the inpatient treatment program at Odyssey House. He was accepted June 2, 2021. A letter from Pam Chavez, Admissions Intake Advisor, is attached as Exhibit A.

5. Odyssey House isn't an easy or forgiving program. Its treatment model focuses on personal responsibility, accountability, and the day-to-day challenges of addiction in a highly structured and therapeutic setting.

6. With "treatment incarceration" now available as a condition, Mr. Crespin can overcome the statutory presumptions applicable to his case and the Court can fashion a set of conditions that will reasonably assure the safety of the community and his appearance back at court.

For these reasons, Mr. Crespin moves to reopen detention proceedings under 18 U.S.C. § 3142(f).

Dated June 8, 2021.

Respectfully Submitted:
RAMON JOEL CRESPIN

By: /s/ Adam G. Bridge
Assistant Federal Public Defender

¹ The link at ECF No. 15 is to a detention order from a difference case: *United States v. Genaro Alvarado-Velasquez*, Case No. 1:21-cr-00024-TS.